



Department of Toxic Substances Control

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June 2, 2006

Mr. Steve Mayer
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COMMENTS ON THE FINAL FOCUSED STRATEGIC SITES FEASIBILITY STUDY, FORMER MCCLELLAN AIR FORCE BASE (DSR 1440-5)

Dear Mr. Mayer:

The Department of Toxic Substances Control (DTSC) has reviewed the responses to comments (RTCs) on the *Draft Final Focused Strategic Sites Feasibility Study, former McClellan Air Force Base, Sacramento, California*, dated May 2006 (hereafter referred to as the FS). Because of the limited allocated review time, we focused our review only on the RTCs and assume that the only changes in the document are identified in the RTC table. We appreciate the efforts taken to address our comments on the Draft Final FS. While some of our comments were not fully addressed, we concur with the document finalization. Below are comments we have on the final FS.

General Comments:

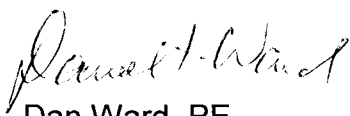
1. Consistent with comments we have made on the draft and draft final document, and comments we've made on the draft final Breakout Shallow Soil Gas (BSSG) Record of Decision and final BSSG Feasibility Study, we disagree with the shallow soil gas cleanup levels proposed by the Air Force. Rather than reiterate our prior comments explaining our reasons, we refer you to our comments on those documents.

Related to this issue are the comments previously made by DTSC on the applicability of using the Johnson-Ettinger (J-E) model to predict vapor intrusion into structures above disposal pits. DTSC believes that the J-E model is inapplicable for this use. For details, we refer you to our comments on the Draft Final FS.

2. Consistent with the draft final FS, the Air Force selectively identified only those Applicable or Relevant and Appropriate Requirement (ARARs) that the Air Force believes are applicable to the evaluated remedies. Due to the limited review time, DTSC could not review the ARARs list and determine if there were other ARARs that should have been included. We reserve the right to identify additional other ARARs at a future date.
3. We and our sister-agency, the Department of Health Services have previously expressed our concerns over leaving radioactive waste in place, or excavating and placing the waste in an on-base consolidation unit as presented in retained Alternatives 3, and 5. Our most significant concern is with Alternative 3 which would leave waste in disposal pits that have only been partially characterized. There are numerous safety issues, risks, and effectiveness uncertainties associated with these remedies which will need to be fully addressed in order for any of these remedies to be implemented.
4. In comments on the draft FS, the Central Valley Regional Water Quality Control Board noted several California Title 27 regulations that should be included in the ARARs. The Air Force has responded that the consolidation unit alternative is designed solely to be equivalent to a Class I landfill, not a Class II landfill, and that Title 22 regulations apply rather than most of Title 27. Additionally, the Air Force indicated a belief that the Title 22 regulations are generally more prescriptive than Title 27, so the majority of the Title 27 requirements will be met. DTSC is concerned that the Air Force is making this decision based on the limited disposal pit characterization and recommends that the consolidation unit Alternative include an option of creating a Class II landfill equivalent.

If you have any questions regarding these comments, please contact me at (916) 255-3688.

Sincerely,



Dan Ward, PE
Chief, Base Closure Unit
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